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August 2, 2010

Delta Stewardship Council
c/o P. Joseph Grindstaff, Interim Executive Director
650 Capitol Mall, Fifth Floor
Sacramento, CA 95814

**Subject: Comments on Draft Delta Stewardship Council
2nd Draft Interim Plan**

Dear Council Members and Mr. Grindstaff:

The Port of West Sacramento (formally known as the Port of Sacramento) was created in 1949 by the State Legislature as a Special District under the California Harbors and Navigation Code. The Port of West Sacramento operates a regional port terminal in the City of West Sacramento, immediately adjacent to Downtown Sacramento, and operates the Sacramento River Deep Water Ship Channel ("Ship Channel") that travels through the secondary and primary zone of the Delta. The Ship Channel is a federal navigation project and was completed in 1961 along with the completion of initial port facilities and the operational opening of the Port of West Sacramento occurring in 1963. Over the following 47 years, significant public investment has been made in maintaining this navigation project and increasing cargo transportation thereby improving regional economics, the environment and promoting the creation of jobs.

Projects under the jurisdiction of the DSC impacting any operational aspect of the Ship Channel or Port, must be carefully considered so as to minimize the effects on this important regional facility and international trade terminus. Several critical federal projects are being implemented within the Ship Channel and Port, and several more federal and state projects are being developed. Please consider the following comments to the Second Draft Interim Plan.

Restrict Impacts to Port Operations. The federal government has invested hundreds of millions of dollars in the original construction and current operation of the Port of West Sacramento. Included in the suite of actions is regular maintenance dredging of the Ship Channel. Considered one of the cleanest dredge operations in the country, the Port dredge materials have been used in levee construction and other public projects throughout the region. The Port is currently developing projects using this material for habitat restoration in the

Delta that will be implemented in the near future. Currently, the State of California and the US Army Corps of Engineers, is funding a Federally Authorized project designed to improve air quality in Northern California, by reducing truck traffic and increasing the capacity of inland ports like the Port of West Sacramento. The channel deepening project is scheduled to continue in federal fiscal year 2011 after completion of the Limited Reevaluation Report and corresponding EIR/EIS. Contained in the FY2011 federal budget for \$12.5 million and state budget for \$10 million, the construction of the deepening project would likely continue in July 2011. Actions proposed in the Interim Plan should carefully analyze impacts on existing funding sources and agency alliances.

Enhance Material Storage and Reuse. The Port of West Sacramento is a large land owner in the Delta region and operates dredge material deposition locations along the entire 26 mile length of the Ship Channel. These engineered storage areas are vital to regional goods movement and ship operations. The continued annual maintenance dredging and the proper storage of dredge materials are needed to keep the channel at the 35-foot operating depth. The Port of West Sacramento utilizes soils from dredge cells to supply materials to public works projects throughout the region including flood control projects and habitat restoration projects. This material is clean and is not contaminated as no mining or other industrial use has historically taken place within Port footprint. Any actions proposed in the Interim Plan should carefully analyze the impact on any existing and proposed Port dredge material operations. Conversely, the material present may provide an opportunity for the DSC and other state agencies to utilize this immediately available, clean material.

No Impacts to Ship Navigation. The Port of West Sacramento and the Ship Channel are vital shipping links, strategic operations for green house gas reduction in our region and offer an opportunity to link the Delta region with economic viability and environmental stewardship. Large shipping vessels transiting the Ship Channel are under the control of the San Francisco Bar Pilots at all times and have restricted ability to move due to the compressed width of the Ship Channel. While this offers a small footprint, any changes in water flows into the Ship Channel or other engineering changes to the Ship Channel can have a negative impact on navigation, and any proposed changes need to be carefully analyzed to determine its impact on navigability and operations at the Port.

Consistency Between Federal and State Requirements. The completion of the Channel Deepening Project, like many other projects within the Delta, is made possible through a negotiated array of federal and state agency relationships on a myriad of environmental and engineering areas of concern. The US Army Corps of Engineers and its local sponsor, the Port of West Sacramento, have been working diligently on efforts such as the Long Term Management Strategy (LTMS) to balance the environmental concerns of the Delta with the goods movement needs of the Port. The Port respectfully requests that the DSC take advantage of the work that has been done to date and continue the effort to strike a balance between Federal and State Requirements to ensure that projects like the Channel Deepening Project can be implemented in a timely manner within the Delta.

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Page 3 of 3

Thank you for your consideration of these comments. If you have any questions, please contact me at mikel@cityofwestsacramento.org or (916) 617-4881.

Sincerely,



Mike Luken
Manager, Port of West Sacramento

- C: Sacramento-Yolo Port District Commissioners
Assemblyperson Mariko Yamada
Senator Lois Wolk
Mike Webb, Deputy Legislative Secretary, Office of the Governor (Goods Movement)
Toby Ross, City Manager, City of West Sacramento
Rick Asheris, Executive Director, Port of Stockton
California Association of Port Authorities
Tom Scheeler, Port Engineer, Port of West Sacramento